

# EPA Staff Participation in Voluntary Consensus Standard (VCS)

## *What Managers Need to Know*

The National Technology Transfer and Advancement Act (NTTAA, PL 103-104) states that EPA *shall* (with narrow exceptions<sup>1</sup>) use Voluntary Consensus Standards (VCS) as a means to carry out policy objectives and *shall* participate in the development of VCS whenever it is in the public interest and is compatible with agency or departmental mission, priorities, budgetary resources and authorities.

VCS are technical documents (*e.g.*, test methods, specifications, terminology, etc.) developed using procedures that have safeguards to ensure that the standards development process is open to all interested parties, and that the input and viewpoints of a broad range of interested parties are taken into account and treated fairly. VCS bodies are generally private sector, not-for-profit entities.

Consistent with the NTTAA and OMB A-119<sup>2</sup> (which provides guidance on how to implement the NTTAA), EPA Managers should seek opportunities to advance programmatic objectives through participation in VCS activities and should prioritize this in program budgets.

This can help EPA use public resources in the most efficient manner possible, reduce regulatory burden, spur innovation and foster scientific exchange to advance EPA's mission.

OMB A-119 requires agency representatives to be authorized to participate in standards development activities. In keeping with this requirement, and to ensure that applicable legal and policy requirements are met, an Office Director (headquarters) or Division Director (Regions) needs to approve EPA staff participation ([Click here](#) to access the online approval form).

The NTTAA, OMB A-119, and other laws and policies (*e.g.*, Administrative Procedure Act, Freedom of Information Act, ethics laws and policies, etc.) contain important requirements that EPA Managers should consider when approving and managing EPA staff participation in these activities. "Legal and Policy Guidance for EPA Staff Participation in Private Sector Standards Development Activities" provides more information about these requirements and how to implement them.

EPA's Standards Executive (Elise Owen, [owen.elise@epa.gov](mailto:owen.elise@epa.gov)) coordinates EPA's participation in VCS activities and can assist with related questions and concerns.

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<sup>1</sup> NTTAA § 12(d)(1) directs federal agencies and departments to use VCS except where "inconsistent with applicable law or otherwise impractical"

<sup>2</sup> OMB Circular A-119: "Federal Participation in the Development and Use of Voluntary Consensus Standards and Conformity Assessment." In addition to consideration of VCS, OMB A-119 recognizes the contributions of standardization activities that take place outside of the VCS process.